

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

HOBBS OCD

State of New Mexico
Energy Minerals and Natural Resources

Form C-141
Revised August 8, 2011

MAR 23 2012

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

RECEIVED

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

| | | | |
|-----------------|----------------------------------|----------------------|---------------|
| Name of Company | Legacy Reserves Operating LP | Contact | Berry Johnson |
| Address | P.O. Box 10848 Midland, TX 79702 | Telephone No. | 432-689-5200 |
| Facility Name | State K Com #3 | Facility Type | BATTERY |
| Surface Owner | Mineral Owner | API No. 30-025-23847 | |

LOCATION OF RELEASE

| | | | | | | | |
|---------|----------|-------|---------------|------------------|---------------|----------------|--------|
| Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
| 030 | 16S | 36E | 660 | SOUTH | 1830 | EAST | LEA |

Latitude _____ Longitude _____

NATURE OF RELEASE

| | | | | | |
|---|--|-----------------------------|------------|--|---------|
| Type of Release | Oil | Volume of Release | 72 bbls | Volume Recovered | 33 bbls |
| Source of Release | Developed hole in 500 bbl steel production tank | Date and Hour of Occurrence | 03/13/2012 | Date and Hour of Discovery 03/14/2012 by Maxey Brown w/OCD | |
| Was Immediate Notice Given? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required | | | | |
| By Whom? | If YES, To Whom? | | | | |
| Was a Watercourse Reached? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | | | |
| If YES, Volume Impacting the Watercourse. | | | | | |

If a Watercourse was Impacted, Describe Fully.*

DTW = 70'

Describe Cause of Problem and Remedial Action Taken.*

Developed hole in 500 bbl steel production tank. Upon receipt of letter from OCD, dispatched vacuum truck to recover approximately 33 bbls.

Describe Area Affected and Cleanup Action Taken.*

Dispatched vacuum truck to recover approximately 33 bbls.
Oil contained within the berm. Talon Environmental was contacted to initiate a remediation plan.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

| | | | |
|--------------------------------------|--|--|-----------------------------------|
| Signature: <i>Berry Johnson</i> | | OIL CONSERVATION DIVISION | |
| Printed Name: Berry Johnson | | Approved by Environmental Specialist: <i>Berry Johnson</i> | |
| Title: Operations Superintendent | Approval Date: 3/23/12 | Expiration Date: 5/23/12 | |
| E-mail Address: bjohnson@legacyp.com | Conditions of Approval: SUBMIT FINAL C-141 | | Attached <input type="checkbox"/> |
| Date: 03/20/2012 | Phone: 432-689-5227 | IRP-06-14-3061 | |

* Attach Additional Sheets If Necessary

JUN 7 2014

NSAD 1416455714



September 25, 2013

Mr. Geoffrey Leking
NMOCD District I
1625 N. French Dr.
Hobbs, NM 88240

AMARILLO
921 North Bivins
Amarillo, Texas 79107
Phone 806.467.0607
Fax 806.467.0622

ARTESIA
408 West Texas Ave.
Artesia, New Mexico 88210
Phone 575.746.8768
Fax 575.746.8905

HOBBS
318 East Taylor Street
Hobbs, New Mexico 88240
Phone 575.393.4261
Fax 575.393.4658

MIDLAND
2901 State Hwy 349
Midland, Texas 79706
Phone 432.522.2133
Fax 432.522.2180

OKLAHOMA CITY
7700 North Hudson Avenue
Suite 10
Oklahoma City, Oklahoma 73116
Phone 405.486.7030
Fax 806.467.0622

SAN ANTONIO
11 Commercial Place
Schertz, Texas 78154
Phone 210.265.8025
Fax 210.568.2191

Subject: **Soil Assessment and Remediation Work Plan**
Legacy Reserves Operating, LP
State K Com No. 3
API # 30-025-23847

Dear Mr. Leking,

Legacy Reserves Operating, LP has contracted Talon/LPE (Talon) to perform soil assessment and remediation services at the above referenced State K Com No. 3 release. Our soil sampling results and proposed remediation activities consist of the following:

Incident Date

March 14, 2012

Background Information

The State K Com No. 3 is located approximately seven (7) miles southwest of Lovington, New Mexico. The legal location for the site is Section 30, Township 16 South and Range 35 East in Lea County, New Mexico. More specifically, the latitude and longitude for the release are 32.887575 North and 103.391621 West.

According to the soil survey provided by the United States Department of Agriculture National Resources Conservation Services, the soil in this area is made up of Kimbrough gravelly loam complex soils with 0 to 3 percent slopes. The local surface and shallow geology, Tertiary Age sedimentary deposits within in the Ogallala Formation, is comprised of calcareous-loamy alluvium and calcareous-loamy eolian deposits derived from sedimentary rock and hard caliches. Drainage courses in this area are normally dry. The New Mexico State Engineer's web site indicates the nearest ground water data to be in S30-T16S-R36E. The ground water in Section 30 is reported to be a depth of 80-feet below ground surface (bgs). The referenced groundwater data is presented in Appendix I.

The ranking for this site is 10 based on the as following:

| | |
|--------------------------------|------------|
| Depth to ground water | 50' - 100' |
| Wellhead Protection Area | >1000' |
| Distance to surface water body | >1000' |

ENVIRONMENTAL CONSULTING
ENGINEERING
DRILLING
CONSTRUCTION
SPILL MANAGEMENT
GENERAL CONTRACTING

Toll Free: 866.742.0742
www.talonlpe.com

Incident Description

The Oil Conservation Division (OCD) of Hobbs issued a Letter of Violation (LOV) to Legacy Reserves that there was visible contamination inside the berms of the tank battery and the southeast corner of the berm was leaking. The OCD requested a remediation plan be submitted. The tank battery has been subsequently removed by Legacy.

Actions Taken

On February 14, 2013 Talon/LPE mobilized personnel to begin assessment and soil sampling for the construction of a work plan. Grab soil samples were collected in the impacted areas utilizing a hand auger. A site map is attached illustrating the sample locations.

All soil samples were collected by Talon personnel wearing clean nitrile gloves. The soil samples were placed in laboratory provided sample containers, iced and transported to Cardinal Laboratories in Hobbs, New Mexico for analysis. The samples were tested for TPH (Total Petroleum Hydrocarbons) using EPA Method 8015M, and volatile organics (BTEX) using EPA Method 8021B. The chlorides were analyzed per Method SM4500Cl-B. The complete laboratory report is attached as Appendix II.

Analytical Results

Analytical results received from Cardinal Laboratories are summarized below:

February 27, 2013

| <u>Sample</u> | <u>Depth</u> | <u>BTEX</u> | <u>Chlorides</u> | <u>TPH (mg/kg)</u> |
|---------------|--------------|-------------|------------------|--------------------|
| S-1 | 0.5' | -- | 1310 | -- |
| S-2 | 0.5' | -- | 64 | -- |
| S-3 | 0.5' | <0.300 | 144 | 829 |
| S-4 | 0.5' | 0.392 | 48 | 7396.7 |

No visible indications of hydrocarbon impacts were noted near sample locations S-1 and S-2.

For this site's ranking, New Mexico Oil Conservation District action level criterion for BTEX is 50 mg/kg, Benzene is 10 mg/kg and TPH is 1,000 mg/kg. The chloride remediation standard is considered to be 1,000 mg/kg.

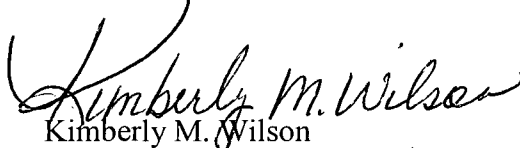
Proposed Remedial Actions


- The impacted area in the vicinity of sample location S-4 will be excavated to a depth based upon visible observations and field PID readings. The excavated soil will be transported to a NMOCD approved solid waste disposal facility.
- Confirmation soil samples will be collected from the sidewalls and bottom of the excavation upon completion. The soil samples will be submitted to the laboratory for TPH analysis using Method 8015M and volatile organics (BTEX) using EPA Method 8021B.
- The chloride impacted area at S-1 will be scraped with a backhoe and transported to a NMOCD approved solid waste disposal facility. Field titration for total chlorides will be obtained for confirmation in this area. Upon completion of field testing, a confirmation sample will be obtained and submitted for laboratory analysis.
- Upon NMOCD approval of the confirmation samples, the excavated areas will be backfilled to grade using new material transported from a local borrow pit. The area will be contoured to match the existing terrain.
- A final report documenting all field activities and lab reports will be provided to the NMOCD Hobbs Office utilizing Form C-141.

Should you have any questions or if further information is required, please do not hesitate to contact our office at 575.746.8768.

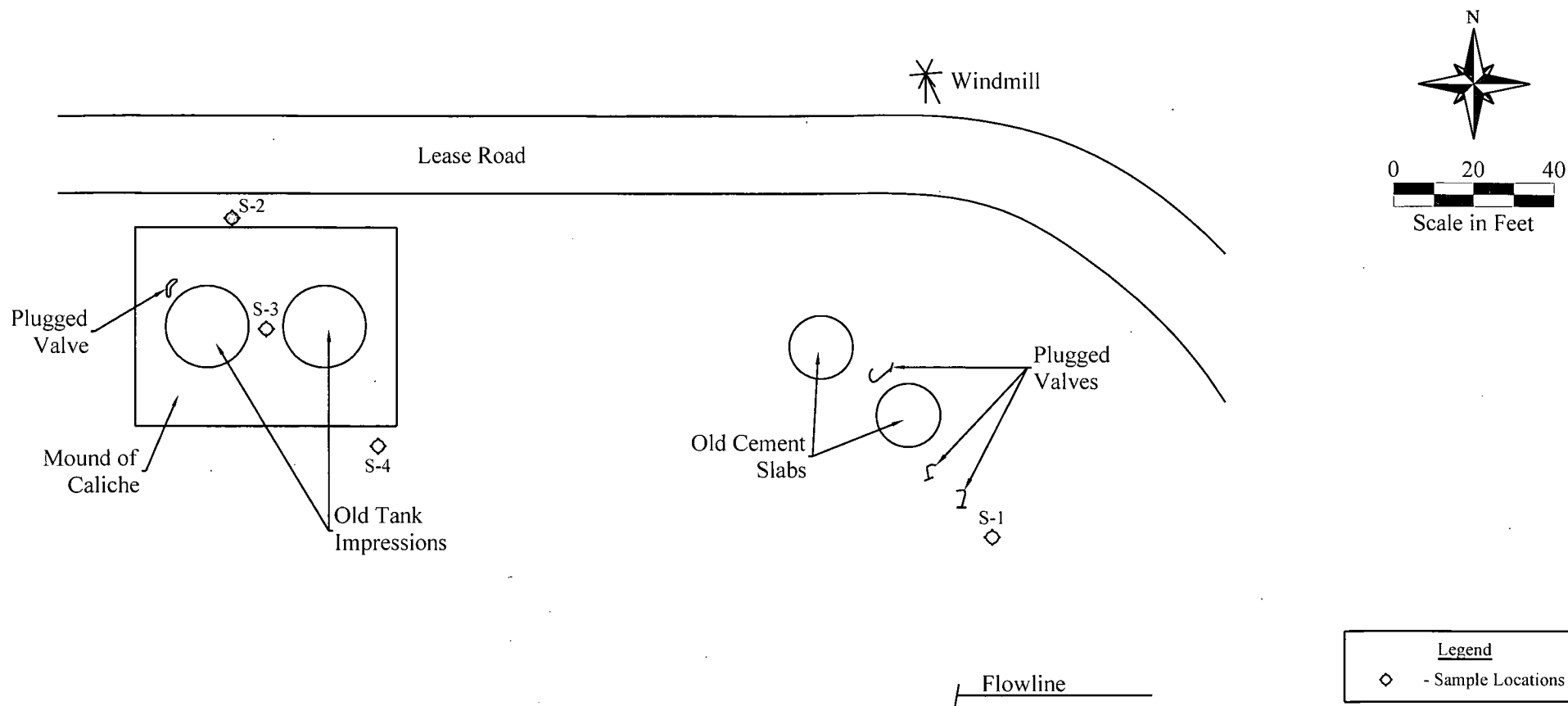
Respectfully submitted,

TALON/LPE


Kimberly M. Wilson
Environmental Scientist


David J. Adkins
District Manager

SITE MAP



Date: 09/25/2013

Scale: 1" = 40'

Drawn By: TJS

State K Com #3
Legacy Reserves Operation, LP
Eddy County, New Mexico
Figure 1 - Site Plan

APPENDIX I
GROUNDWATER DATA
LETTER OF VIOLATION (LOV)



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the
POD suffix indicates the
POD has been replaced
& no longer serves a
water right file.)

(R=POD has
been replaced,
O=orphaned,
C=the file is
closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

| POD Number | POD Code | Subbasin | County | Q 64 | Q 16 | Q 4 | Sec | Tws | Rng | X | Y | Distance | Depth Well | Depth Water | Water Column |
|---------------------|-------------|----------|--------|------|------|-----|-----|-----|-----|--------|----------|----------|---------------|----------------|-----------------|
| <u>L 01608</u> POD1 | | | LE | 2 | 2 | 30 | 16S | 36E | | 650795 | 3641175* | 1311 | 145 | 80 | 65 |
| <u>L 02145</u> | L | | LE | 2 | 3 | 31 | 16S | 36E | | 650033 | 3638743* | 1313 | 120 | 78 | 42 |
| <u>L 02187</u> | L | | LE | 2 | 3 | 31 | 16S | 36E | | 650033 | 3638743* | 1313 | 122 | 74 | 48 |
| <u>L 02212</u> | L | | LE | 2 | 3 | 31 | 16S | 36E | | 650033 | 3638743* | 1313 | 105 | 45 | 60 |
| <u>L 04932</u> | L | | LE | 2 | 1 | 30 | 16S | 36E | | 649990 | 3641162* | 1484 | 104 | 90 | 14 |

Average Depth to Water: **73 feet**

Minimum Depth: **45 feet**

Maximum Depth: **90 feet**

Record Count: 5

UTMNAD83 Radius Search (in meters):

Easting (X): 650714

Northing (Y): 3639866

Radius: 2000

*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

APPENDIX II
LABORATORY RESULTS



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

February 27, 2013

DAVID ADKINS

TALON LPE

408 W. TEXAS AVE.

ARTESIA, NM 88210

RE: STATE K

Enclosed are the results of analyses for samples received by the laboratory on 02/20/13 8:22.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

| | |
|------------------|------------------------------|
| Method EPA 552.2 | Haloacetic Acids (HAA-5) |
| Method EPA 524.2 | Total Trihalomethanes (TTHM) |
| Method EPA 524.4 | Regulated VOCs (V1, V2, V3) |

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

TALON LPE
DAVID ADKINS
408 W. TEXAS AVE.
ARTESIA NM, 88210
Fax To: (575) 745-8905

Received: 02/20/2013
Reported: 02/27/2013
Project Name: STATE K
Project Number: 701047.043.01
Project Location: NOT GIVEN

Sampling Date: 02/14/2013
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Daniel Wade

Sample ID: S-1 0.5' (H300462-01)

| Chloride, SM4500CI-B | | | mg/kg | | | | | | | Analyzed By: DW | |
|----------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|-----------------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | | |
| Chloride | 1310 | 16.0 | 02/25/2013 | ND | 432 | 108 | 400 | 3.64 | | | |

Sample ID: S-2 0.5' (H300462-02)

| Chloride, SM4500CI-B | | | mg/kg | | | | | | | Analyzed By: DW | |
|----------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|-----------------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | | |
| Chloride | 64.0 | 16.0 | 02/25/2013 | ND | 432 | 108 | 400 | 3.64 | | | |

Sample ID: S-3 0.5' (H300462-03)

| BTX 8021B | | | mg/kg | | | | | | | Analyzed By: AP | |
|----------------|--------|-----------------|------------|--------------|------|------------|---------------|------|-----------|-----------------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | | |
| Benzene* | <0.050 | 0.050 | 02/26/2013 | ND | 1.85 | 92.6 | 2.00 | 17.8 | | | |
| Toluene* | <0.050 | 0.050 | 02/26/2013 | ND | 1.82 | 91.2 | 2.00 | 16.9 | | | |
| Ethylbenzene* | <0.050 | 0.050 | 02/26/2013 | ND | 1.78 | 89.0 | 2.00 | 16.3 | | | |
| Total Xylenes* | <0.150 | 0.150 | 02/26/2013 | ND | 5.40 | 90.0 | 6.00 | 17.0 | | | |
| Total BTX | <0.300 | 0.300 | 02/26/2013 | ND | | | | | | | |

Surrogate: 4-Bromofluorobenzene (PIE) 116 % 89.4-126

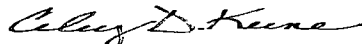
| Chloride, SM4500CI-B | | | mg/kg | | | | | | | Analyzed By: DW | |
|----------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|-----------------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | | |
| Chloride | 144 | 16.0 | 02/25/2013 | ND | 432 | 108 | 400 | 3.64 | | | |

| TPH 8015M | | | mg/kg | | | | | | | Analyzed By: MS | |
|-----------|--------|-----------------|----------|--------------|----|------------|---------------|-----|-----------|-----------------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | | |

Cardinal Laboratories

*=Accredited Analyte

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Caley D. Keene, Lab Director/Quality Manager

Analytical Results For:

TALON LPE
DAVID ADKINS
408 W. TEXAS AVE.
ARTESIA NM, 88210
Fax To: (575) 745-8905

Received: 02/20/2013
Reported: 02/27/2013
Project Name: STATE K
Project Number: 701047.043.01
Project Location: NOT GIVEN

Sampling Date: 02/14/2013
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Daniel Wade

Sample ID: S-3 0.5' (H300462-03)

| TPH 8015M | | mg/kg | | Analyzed By: MS | | | | | |
|-------------------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| GRO C6-C10 | <10.0 | 10.0 | 02/26/2013 | ND | 177 | 88.3 | 200 | 12.4 | |
| DRO >C10-C28 | 829 | 10.0 | 02/26/2013 | ND | 161 | 80.7 | 200 | 15.8 | |
| | | | | | | | | | |
| Surrogate: 1-Chlorooctane | 80.3 % | 65.2-140 | | | | | | | |
| Surrogate: 1-Chlorooctadecane | 112 % | 63.6-154 | | | | | | | |

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

TALON LPE
DAVID ADKINS
408 W. TEXAS AVE.
ARTESIA NM, 88210
Fax To: (575) 745-8905

Received: 02/20/2013
Reported: 02/27/2013
Project Name: STATE K
Project Number: 701047.043.01
Project Location: NOT GIVEN

Sampling Date: 02/14/2013
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Daniel Wade

Sample ID: S-4 0.5' (H300462-04)

| BTEX 8021B | | mg/kg | | Analyzed By: AP | | | | S-04 | |
|-------------------|--------------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 02/27/2013 | ND | 1.85 | 92.6 | 2.00 | 17.8 | |
| Toluene* | <0.050 | 0.050 | 02/27/2013 | ND | 1.82 | 91.2 | 2.00 | 16.9 | |
| Ethylbenzene* | 0.392 | 0.050 | 02/27/2013 | ND | 1.78 | 89.0 | 2.00 | 16.3 | |
| Total Xylenes* | <0.150 | 0.150 | 02/27/2013 | ND | 5.40 | 90.0 | 6.00 | 17.0 | |
| Total BTEX | 0.392 | 0.300 | 02/27/2013 | ND | | | | | |

Surrogate: 4-Bromofluorobenzene (PIC) 200 % 89.4-126

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: DW | | | | | |
|----------------------|-------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 48.0 | 16.0 | 02/25/2013 | ND | 432 | 108 | 400 | 3.64 | |

| TPH 8015M | | mg/kg | | Analyzed By: MS | | | | S-06 | |
|------------------------|-------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| GRO C6-C10 | 96.7 | 50.0 | 02/26/2013 | ND | 177 | 88.3 | 200 | 12.4 | |
| DRO >C10-C28 | 7300 | 50.0 | 02/26/2013 | ND | 161 | 80.7 | 200 | 15.8 | |

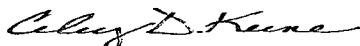
Surrogate: 1-Chlorooctane 113 % 65.2-140

Surrogate: 1-Chlorooctadecane 303 % 63.6-154

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

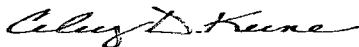
Notes and Definitions

- S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
- S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
- Samples reported on an as received basis (wet) unless otherwise noted on report

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division

Response Required - Deadline Enclosed

Field Inspection Program

Protecting the Integrity of Our Environment

14-Mar-12

HOBBS OCD

LEGACY RESERVES OPERATING, LP
P O BOX 10848
MIDLAND TX 79702

MAR 15 2012

RECEIVED

LETTER OF VIOLATION - Inspection

Dear Operator

The following inspection(s) indicate that the well equipment, location or operational status of the well(s) failed to meet standards of the New Mexico Oil Conservation Division as described in the detail section below. To comply with standards imposed by Rules and Regulations of the Division, corrective action must be taken immediately and the situation brought into compliance. The detail section indicates preliminary findings and/or probable nature of the violation. This determination is based on an inspection of your well or facility by an inspector employed by the Oil Conservation Division on the date(s) indicated.

Please notify the proper district office of the Division, in writing, of the date corrective actions are scheduled to be made so that arrangements can be made to reinspect the well and/or facility.

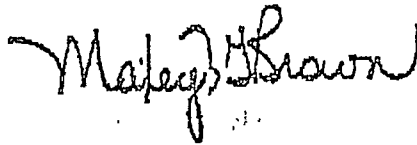
INSPECTION DETAIL SECTION

| STATE K COM No.003 | | O-30-16S-36E | | 30-025-23847-00-00 | | |
|---|------------------|---|------------|-----------------------------|--------------------------|----------------|
| Inspection Date | Type Inspection | Inspector | Violation? | Significant Non-Compliance? | Corrective Action Due By | Inspection No |
| 03/14/2012 | Routine/Periodic | Maxey Brown | Yes | No | 6/17/2012 | 1MGB1207434480 |
| Violations | | | | | | |
| Absent Well Identification Signs (Rule 103) | | | | | | |
| Surface Leaks/Spills | | | | | | |
| Comments on Inspection | | NEED TO INSTALL SIGN AT TANK BATTERY. RULE 19.15.16.8 MUST INCLUDE CURRENT OPERATOR. ALSO CONTAMINATION INSIDE OF BERM AND LEAKING TO THE SOUTHEAST CORNER ON THE OUTSIDE. IDENTIFY FILE C-141 REPORT AND TAKE CORRECTIVE ACTION. PROD IS CURRENT. NEW LEGACY SIGN AT WELL. MGB | | | | |

MAR 15 2012

In the event that a satisfactory response is not received to this letter of direction by the "Corrective Action Due By" date shown above further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a hearing before a Division Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

Sincerely,



Hobbs OCD District Office

COMPLIANCE OFFICER

Note: Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data
Significant Non-Compliance events are reported directly to the LPA, Region VI Dallas, Texas